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Brandon Reed, Trevor Hein and Thomas Parenteau*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DIAMOND RESORTS INTERNATIONAL, INC., a )	Case No.: 2:17-cv-03007-APG-VCF
Delaware corporation; DIAMOND RESORTS )	
CORPORATION, a Maryland corporation; )	
DIAMOND RESORTS U.S. COLLECTION )	
DEVELOPMENT, LLC, a Delaware limited liability )	<b>STIPULATION AND ORDER TO</b>
company; and DIAMOND RESORTS )	<b>EXTEND TIME TO FILE REPLY</b>
MANAGEMENT, INC., an Arizona corporation, )	<b>BRIEFS IN SUPPORT OF</b>
)	<b>MOTIONS TO DISMISS</b>
Plaintiffs, )	
)	<b>(FIRST REQUEST)</b>
vs. )	
)	
REED HEIN & ASSOCIATES, LLC, d/b/a )	
TIMESHARE EXIT TEAM, a Washington limited )	
liability company; BRANDON REED, an individual )	
and citizen of the State of Washington; TREVOR )	
HEIN, an individual and citizen of Canada; )	
THOMAS PARENTEAU, an individual and citizen )	
of the State of Washington; HAPPY HOUR MEDIA )	
GROUP, LLC, a Washington limited liability )	
company; MITCHELL REED SUSSMAN, ESQ. )	
d/b/a THE LAW OFFICES OF MITCHELL REED )	
SUSSMAN & ASSOCIATES, an individual citizen )	
of the State of California; SCHROETER, )	
GOLDMARK & BENDER, P.S. A Washington )	
professional services corporation; and KEN B. )	
PRIVETT, ESQ., a citizen of Oklahoma, )	
)	
Defendants. )	

Pursuant to Local Rules 6-1 and 7-1, Plaintiffs DIAMOND RESORTS INTERNATIONAL, INC.; DIAMOND RESORTS CORPORATION; DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC; and DIAMOND RESORTS MANAGEMENT, INC., (“Plaintiffs”), and Defendants REED HEIN & ASSOCIATES, LLC d/b/a TIMESHARE EXIT TEAM; BRANDON REED; and TREVOR HEIN (“Reed Hein Defendants”) and HAPPY HOUR MEDIA GROUP, LLC (“Happy Hour”), by and through their respective attorneys of record, stipulate as follows:

### **STIPULATION**

1. Plaintiffs filed their Complaint on December 6, 2017 [ECF No. 1].
2. The Reed Hein Defendants filed a motion to dismiss. [ECF No. 22].
3. The Court dismissed certain claims and the individual defendants from the lawsuit and allowed Plaintiffs to file an amended complaint. [ECF No. 50].
4. Plaintiffs filed their Amended Complaint for Damages and Injunctive Relief (“Amended Complaint”) on January 4, 2019 [ECF No. 59].
5. The Amended Complaint in this case involves complex claims of business tort, unfair business practices, and false advertising.
6. The parties agreed to an extension of time for Reed Hein Defendants and Happy Hour to respond to the Amended Complaint until February 28, 2019. [ECF No. 71] and [ECF No. 73].
7. On February 28, 2019, Reed Hein Defendants filed its Motion for Partial Dismissal of Amended Complaint [ECF No. 87].
8. On February 28, 2019, Happy Hour filed its Motion to Dismiss Amended Complaint. [ECF No. 88].
9. The parties agreed to an extension of time for Plaintiffs to file their responses to Reed Hein Defendants and Happy Hours’ Motions to Dismiss until March 25, 2019 in order for Plaintiffs to fully brief the legal issues. [ECF No. 94].
10. On March 25, 2019, Plaintiffs filed their Memorandum of Points and Authorities in Opposition to Reed Hein Defendants and Happy Hour’s Motions to Dismiss. [ECF No. 96 and

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1 97]. The Reply Briefs in support of the Defendants' motions are currently due on April 1, 2019.  
2 11. Due the numerous legal issues raised by the claims made in this case, and in order  
3 to adequately brief the pending motions, the Reed Hein Defendants and Happy Hour request an  
4 additional seven (7) days to file their Replies, or until April 8, 2019. This is the first request for  
5 extension of time related to the filing of Reply Briefs.  
6 12. The undersigned counsel conferred with Plaintiffs' counsel and Plaintiffs do not  
7 oppose the extension request.  
8 13. This stipulation is not made for purposes of delay.  
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14. Therefore, the parties agree that the Reed Hein Defendants' and Happy Hour's respective Replies in support of the Motions to Dismiss Amended Complaint are now due on or before April 8, 2019.

DATED: March 29th, 2019.

DATED: March 29th, 2019.

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COOPER LEVENSON, P.A.

/s/ David T. Gluth

/s/ Daniel J. Barsky

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# **ORDER**

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

DATED: April 1, 2019

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